

January 2021

Report to EPA on Site 0153

“ . . . protecting Indy’s underground drinking water . . . ”

Indianapolis, Indiana



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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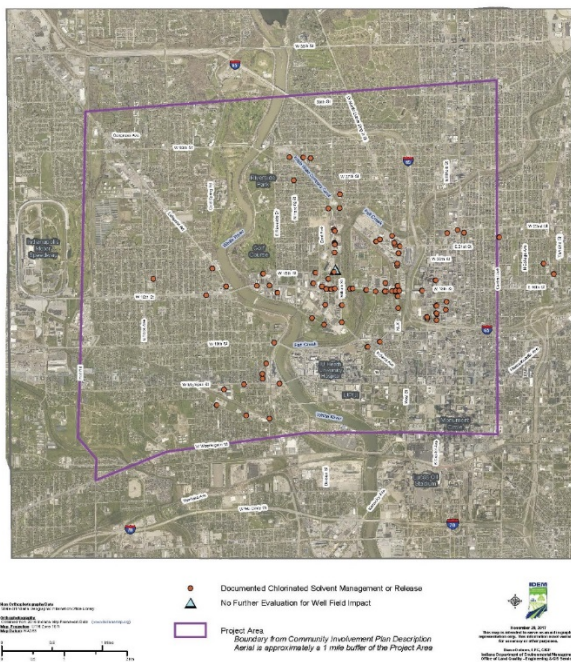


SITE OVERVIEW

Citizens Water operates the public drinking water supply for the city of Indianapolis. In 2013, Citizens Water notified IDEM that low levels of chlorinated solvents had been detected in the “raw,” untreated underground water at certain wells located within its Riverside and White River wellfields. In 2014, IDEM sampled and found low levels of five chlorinated solvents¹ in five of the 19 water production wells. All levels in the raw water remain below the Maximum Contaminant Levels (MCLs) set by EPA under the Safe Drinking Water Act.

EPA designated the Riverside groundwater contamination as “Site 0153” and proposed it for inclusion on the National Priorities List. In response to public sentiment and updated information from Citizens Water, IDEM subsequently requested that EPA defer the site. On June 8, 2017, EPA and IDEM entered into a Memorandum of Agreement in which Site 0153 was deferred to IDEM’s State Cleanup Program as a Superfund alternative. IDEM has since taken the lead to investigate the source of these low levels of chlorinated solvents in the underground water and will then propose and implement any necessary cleanup activities.

**Site 0153
Project Area**



In general, the investigation area for Site 0153 is bordered by 35th Street to the north, Holt Road to the west, Washington Street to the south, and Central Avenue to the east. Within this area, IDEM has identified 89 sites where VOCs may have been used at some time.

¹ Tetrachloroethylene, trichloroethylene, 1,1,1-trichloroethane, cis-1,2-dichloroethylene and vinyl chloride.

IDEM's ACTIVITIES SINCE TAKING THE LEAD

Since taking the lead on June 8, 2017, IDEM:

- Sent 13,400 initial letters and fact sheets (in English and Spanish) to residents and businesses located within the site.
- Issued notice of liability letters for 25 sites and over 140 information request letters.
- Begun evaluations of the majority of the initial 89 sites and completed investigations of four sites.
- Completed the "Community Involvement Plan," in February 2018, and met with environmental groups regarding potential updates.
- Held several public information meetings at various neighborhoods within Site 0153. Information about these meetings is posted on the project website at www.idem.IN.gov/Site0153.
- Solicited and awarded a Technical Assistance Grant to Indianapolis Environmental Equity Council, Inc., a nonprofit comprised of several neighborhood organizations.
- Held bi-monthly stakeholder consultations with the city of Indianapolis, Citizens Water, 16 Tech, and the Marion County Health Department to coordinate complete responses to public concerns.
- Continues to update the interactive map on the project website at www.idem.IN.gov/Site0153, with the most recent information regarding the ongoing investigations and site specific cleanups.
- Established a public document repository on the 12th Floor of Indiana Government Center North, 105 North Senate Street, Indianapolis.
- After public notice and comments, including comments from EPA, in January 2021, IDEM completed a Remedial Investigation Report, a Human Health and Ecological Risk Assessment, and a Feasibility Study.

COMMUNITY CONCERNS

Through multiple meetings and discussions with the community regarding Site 0153, community members have shared the following concerns with IDEM.

Ensuring Safe Drinking Water

IDEM and Citizens Water continue to monitor the drinking water for contaminant levels. Citizens Water has committed to taking any production well where raw water exceeds an MCL out of service and only return it to service once raw water becomes, or is treated to, below SDWA MCLs (drinking water standards) established by EPA to ensure that the drinking water remains safe to consume.

As part of its drinking water operations, Citizens Water combines the underground water from its wellfields with surface water from the Indianapolis Central Canal and then treats and filters all the water before sending it to customers. Citizens Water routinely tests the finished water for over 300 constituents, including chlorinated solvents. Citizens Water has and will continue to test the water of homes receiving municipal water upon request and at no cost to the property owner. To date, (1) no chlorinated solvents have ever been detected in finished water; (2) all levels in the raw water from active production wells remain below the MCLs even before treatment; and (3) ongoing testing confirms that the finished drinking water Citizens Water delivers to homes and businesses meets all Safe Drinking Water Act requirements. Test results and other information can be found on the State Drinking Water Information System website at myweb.IN.gov/IDEM/DWW/index.jsp. Though not required by law to do so, Citizens decided to shut down one of its 19 production wells based on raw, underground water monitoring results.

In February and March 2018, IDEM participated in split sampling from the production wells then in use, and sampling of the finished water served to customers. During the February and March 2018 sampling events, the trace amounts of chlorinated solvents found in the raw water pumped from the aquifer were below the Maximum Contamination Levels allowed under the Safe Drinking Water Act. No chlorinated solvents were found in the finished water being served to the Citizens Water customers. Results of the two sampling events are in the Virtual File Cabinet, at: <https://vfc.idem.in.gov/DocumentSearch.aspx> under documents numbers 80640260 and 80644102, respectively.

Seven private wells have been identified in the Site 0153 investigation area. The Marion County Health Department has investigated some of these wells and will work to continue to address private well contamination issues and conduct sampling where needed.

Limiting the Loss of Brownfield Funding and Preserving Development Opportunities

By law, U.S. EPA's brownfield funding is automatically withdrawn when a "site" is proposed for the National Priorities List (NPL). Residents and businesses want to know whether they are within the boundaries of the proposed listing of Site 0153.



In September 2017, IDEM sent a letter to U.S. EPA confirming that, for purposes of NPL listing, the “site” is limited to a narrow band where the known plume is located. U.S. EPA’s brownfield funding for 2018 was opened in September. IDEM’s letter will serve to confirm the limited boundaries within which brownfield funding is no longer available within Site 0153 and preserve this funding elsewhere on the site.

To date, brownfields funding has not been denied to an eligible site due to its location within the one-year time of travel boundary for Site 0153.

Reconciling Historic Contamination with Development. IDEM is committed to working with all stakeholders to ensure that proposed area developments may go forward while also responsibly addressing any historic contamination that might be encountered.

Six of the City’s drinking water wells were located within a development known as the “16Tech Innovation District,” a 50 acre mixed-use development project along Indiana Avenue between 10th Street and 16th Street. To facilitate development, in 2019 Citizens Water and 16 Tech relocated these six drinking water wells to new locations both cross gradient and away from the sites of historic industrial activity. The relocation of these six wells greatly reduces the threat posed by the legacy of chlorinated solvents from former industrial sites in the area.

The Resulting Community Involvement Plan. In recognition of the community’s concerns and in response to the community’s interest in Site 0153, on December 8, 2017, IDEM published notice of its Community Involvement Plan (CIP). The goals of IDEM’s community involvement plan are to:

- Identify and respond to community concerns, questions, and information needs.
- Give the public accessible, accurate, timely, and understandable information about the project as it progresses.
- Assist the public in understanding the decision-making process during the investigation, project design, and cleanup of contamination and the community’s role in that process.

- Ensure adequate time and opportunity for the public to give informed and meaningful input.

Although finalized in early 2018, IDEM has since met with local groups to consider further improvements to both the CIP and IDEM's communication with the public in general.

THE INVESTIGATION AND CLEANUP

In June 2017, IDEM began Phase I of the Remedial Investigation, which focuses on systematically investigating the initial 89 sites identified as potential sources of chlorinated solvents. To date, 77 of the 89 properties have either identified or addressed the contamination on their property (or some portion of that contamination) in Voluntary Remediation Agreements, Brownfield Comfort Letters, or in working with IDEM's State Cleanup Section. Since taking the lead in June of 2017, IDEM has sent over 140 requests for information, and issued notice of liability letters to 20 sites. This investigation is ongoing. As warranted, additional investigations have been added to the initial list.

In addition, several other sites have been addressed in the Underground Storage Tank Section, where the contaminant of concern is typically petroleum, not chlorinated solvents. Unless there has been an un-addressed release of chlorinated solvents, these UST sites are not being investigated further as part of the Site 0153 investigation. However, the data from these sites provides further information about the geology and hydrology at those locations within Site 0153.

As of 2020, IDEM had collected enough information to begin preparing a conceptual site model of a proposed CERCLA-protective cleanup. In the fall of 2020, IDEM personnel also conducted drilling and groundwater sampling at key data points within Site 0153. IDEM then completed the Remedial Investigation, Human Health and Ecological Risk Assessment, and Feasibility Study and made the documents available for public comment from November 9th through December 11, 2020. All public comments were favorable. IDEM finalized these documents in January 2021.

In January 2021, IDEM also issued and began a public comment period for a Remedial Action Plan and a Record of Decision for Site 0153. The following table summarizes IDEM's activities regarding the tasks listed in the Memorandum of Agreement:

	Tasks Undertaken	Status
1	Community Involvement Plan	Public Notice 12/17; Finalized 2/18
2	Begin Phase I Remedial Investigation	Began investigation in June 2017
3	Prepare Removal Work Plan as necessary	Based upon investigation to date, no immediate removals are warranted.
4	Complete additional Remedial Investigation as necessary	After public notice ending 12/11/2020, IDEM completed RI Report in Jan. 2021
5	Complete Human Health and Ecological Risk Assessment	After public notice ending 12/11/2020, IDEM completed HHERA in Jan. 2021
6	Complete Feasibility Study	After public notice ending 12/11/2020, IDEM completed FS in Jan. 2021
Remaining Tasks		
7	Proposed Remedial Action Public Comment Period	January 2021
8	Record of Decision	January 2021
9	Remedial Design	One year from publication of Record of Decision
10	Implement Remedial Action	Six months from final Remedial Design/Technical Specifications

TECHNICAL ASSISTANCE GRANT

IDEM is committed to providing funding to the neighborhoods for the purpose of hiring a technical assistance consultant. IDEM began an open grant application process in July 2017. Two competing grant applications were submitted in September 2017, representing the collective efforts of over 20 local groups.

In October 2017, IDEM announced it would proceed with a Technical Assistance Grant (TAG) with a coalition of several neighborhood organizations and churches resulting in the non-profit now known as the Indianapolis Environmental Equity Council, Inc. The TAG will be implemented upon the initiative and instructions of IEEC. The grant process begins with the IEEC identifying precisely what work is of interest to the local community. As of 2021, IDEM and IEEC are finalizing an appropriate statement describing the work that IEEC desires.

OTHER EPA CONCERNS BEING MET

In 2017, IDEM provided notice to the state Natural Resource Trustees, who work in close coordination with their federal counterpart. IDEM has committed to keeping the state Trustees apprised of any releases at the site that injure or may injure natural resources. While they continue to reserve their rights to do so, to date, the state Trustees have not asserted claims at Site 0153.

FUNDING

IDEM is funding the investigation of Site 0153 with state funds. No Superfund trust money is being used. As of the end of 2020, IDEM has sufficient funds remaining to continue the Site 0153 investigation through 2021 and beyond.

IDEM is negotiating a group settlement with several potentially responsible parties within Site 0153. With the anticipated proceeds of the resulting Agreed Order, IDEM will create a Monitoring and Future Response Fund (MAFR Fund). IDEM will use the MAFR Fund to continue to monitor the quality of underground drinking water within Site 0153 and perform any cleanups as necessary.

COMMUNITY RESOURCES AND CONTACTS

Information Repositories

IDEM maintains a website and interactive map for Site 0153 at www.idem.IN.gov/Site0153.

In addition, copies of all documents related to this project can be viewed at:

IDEM Office of Records Management
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